

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal No.: 4:17-cr-0052

PHYLISS TAYBRON,

Defendant.

MOTION TO SEVER

COMES NOW, Defendant, Phyliss Taybron, by and through the undersigned counsel, and pursuant to Rules 8(b) and 14(a) of the Federal Rules of Criminal Procedure, moves this Honorable Court to sever her trial from the trial of the remaining Defendants on the grounds set forth in the Memorandum of Law in Support of the Motion to Sever filed simultaneously herewith.

WHEREFORE, Defendant, Phyliss Taybron, respectfully requests that the Court sever her trial from the trial of the remaining Defendants, and for such further relief as justice requires.

PHYLISS TAYBRON

By: /s/
Eric Leckie, Esq.
Virginia State Bar No.: 86847
Counsel for Phyliss Taybron
INVICTUS LAW
2408 PRINCESS ANNE ROAD
VIRGINIA BEACH, VA 23456
OFFICE (757) 337-2727
FAX (757) 474-1671
Email: ericleckie@invictus-law.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of June 2019, I will electronically file the foregoing with the Clerk of Court using the CM/EMF system, which will send a notification of such filing (NEF) to all counsel of record, including:

Howard J. Zlotnick
Managing Assistant United States Attorney
United States Attorney's Office
Fountain Plaza Three
721 Lakefront Commons, Suite 300
Newport News, Virginia 23606
howard.zlotnick@usdoj.gov

Amy E. Cross
Special Assistant United States Attorney
United States Attorney's Office
Fountain Plaza Three
721 Lakefront Commons, Suite 300
Newport News, Virginia 23606
amy.cross@usdoj.gov

Brian J. Samuels
Assistant United States Attorney
United States Attorney's Office
Fountain Plaza Three
721 Lakefront Commons, Suite 300
Newport News, Virginia 23606
brian.samuels@usdoj.gov

/s/

Eric Leckie, Esq.
Virginia State Bar No.: 86847
Counsel for Phyliss Taybron
INVICTUS LAW
2408 PRINCESS ANNE ROAD
VIRGINIA BEACH, VA 23456
OFFICE (757) 337-2727
FAX (757) 474-1671
Email: ericleckie@invictus-law.com